

BOIES SCHILLER FLEXNER LLP

David Boies (admitted pro hac vice)

333 Main Street

Armonk, NY 10504

Tel.: (914) 749-8200

dboies@bsfllp.com

Mark C. Mao, CA Bar No. 236165

Beko Reblitz-Richardson, CA Bar No. 238027

44 Montgomery St., 41st Floor

San Francisco, CA 94104

Tel.: (415) 293-6800

mmao@bsfllp.com

brichardson@bsfllp.com

James Lee (admitted pro hac vice)

Rossana Baeza (admitted pro hac vice)

100 SE 2nd St., 28th Floor

Miami, FL 33131

Tel.: (305) 539-8400

jlee@bsfllp.com

rbaeza@bsfllp.com

Alison L. Anderson, CA Bar No. 275334

M. Logan Wright, CA Bar No. 349004

2029 Century Park East, Suite 1520

Los Angeles, CA 90067

Tel.: (213) 995-5720

alanderson@bsfllp.com

mwright@bsfllp.com

SUSMAN GODFREY L.L.P.

Bill Carmody (admitted pro hac vice)

Shawn J. Rabin (admitted pro hac vice)

Steven M. Shepard (admitted pro hac vice)

Alexander Frawley (admitted pro hac vice)

Ryan Sila (admitted pro hac vice)

One Manhattan West, 50th Floor

New York, NY 10001

Tel.: (212) 336-8330

bcarmody@susmangodfrey.com

srabin@susmangodfrey.com

sshepard@susmangodfrey.com

afrawley@susmangodfrey.com

rsila@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

Tel.: (310) 789-3100

abonn@susmangodfrey.com

MORGAN & MORGAN

John A. Yanchunis (admitted pro hac vice)

Ryan J. McGee (admitted pro hac vice)

Michael F. Ram, CA Bar No. 104805

201 N. Franklin Street, 7th Floor

Tampa, FL 33602

Tel.: (813) 223-5505

jyanchunis@forthepeople.com

rmcgee@forthepeople.com

mram@forthepeople.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL

CATALDO, JULIAN

SANTIAGO, and SUSAN LYNN

HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

The Honorable Richard Seeborg

Courtroom 3 – 17th Floor

Date: May 15, 2025

Time: 1:30 p.m.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Google's Experts Donna Hoffman, John Black, and Christopher Knittel. As noted in the below chart, the Court has already addressed sealing with respect to some (but not all) of these documents.

Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Expert Report of Donna Hoffman, served by Google on May 31, 2023 <u>Portions</u> : Pg 91, Footnote 280 Attached as Exhibit 1 to the Frawley Declaration	Google	The Court's January 3, 2024 sealing order (Dkt. 353 at 10), which addressed the same document.
Supplemental Expert Report of Donna Hoffman, served by Google on March 24, 2025 Entirety Attached as Exhibit 2 to the Frawley Declaration	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Expert Report of John Black, served by Google on May 31, 2023 <u>Portions</u> : Paragraphs 41, 43, 43, 60, 74, 80, 83, 90, 92, 99, 101, 107, 123, 128, 132, 143-47, 151, 155, 167, 169, 174, 178, 192, 201, 214 Attached as Exhibit 3 to the Frawley Declaration	Google	The Court's January 3, 2024 sealing order (Dkt. 353 at 12), which addressed the same document.
Expert Report of Christopher Knittel, served by Google on May 31, 2023 <u>Portions</u> : Pg 30, Footnote 116; Page 50, Footnote 176; Page 83, Footnote 285 Attached as Exhibit 4 to the Frawley Declaration	Google	The Court's January 3, 2024 sealing order (Dkt. 353 at 12), which addressed the same document.
Transcript from the Deposition of Donna Hoffman, taken by Plaintiffs on July 11, 2023	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order

1	Entirety		
2	Attached as Exhibit 5 to the Frawley Declaration		
3	Transcript from the Deposition of Christopher Knittel, taken by Plaintiffs on July 11, 2023	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
4	Entirety		
5	Attached as Exhibit 6 to the Frawley Declaration		
6	Supplemental Expert Report of Bruce Schneier, served by Plaintiffs on January 6, 2025	Google	Refers to Material Designated “Confidential” and “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
7	Entirety		
8	Attached as Exhibit 7 to the Frawley Declaration		
9			
10			
11			
12			

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: April 3, 2025

Respectfully submitted,

By: /s/ Mark Mao

Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflp.com
BOIES SCHILLER FLEXNER LLP
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile (415) 999 9695

David Boies (admitted *pro hac vice*)
dboies@bsflp.com
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
Telephone: (914) 749-8200

James Lee (admitted *pro hac vice*)
jlee@bsflp.com

Rossana Baeza (admitted *pro hac vice*)
rbaeza@bsfllp.com
BOIES SCHILLER FLEXNER LLP
100 SE 2nd Street, Suite 2800
Miami, FL 33131
Telephone: (305) 539-8400
Facsimile: (305) 539-1307

Alison L. Anderson, CA Bar No. 275334
alanderson@bsfllp.com
M. Logan Wright, CA Bar No. 349004
mwright@bsfllp.com
BOIES SCHILLER FLEXNER LLP
2029 Century Park East, Suite 1520
Los Angeles, CA 90067
Telephone: (813) 482-4814

Bill Carmody (*pro hac vice*)
bcarmody@susmangodfrey.com
Shawn J. Rabin (*pro hac vice*)
srabin@susmangodfrey.com
Steven Shepard (*pro hac vice*)
sshepard@susmangodfrey.com
Alexander P. Frawley
afrawley@susmangodfrey.com
Ryan Sila
rsila@susmangodfrey.com
SUSMAN GODFREY L.L.P.
One Manhattan West, 50th Floor
New York, NY 10001
Telephone: (212) 336-8330

Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100

John A. Yanchunis (*pro hac vice*)
jyanchunis@forthepeople.com
Ryan J. McGee (*pro hac vice*)
rmcgee@forthepeople.com
Michael F. Ram (CA Bar No. 238027)
mram@forthepeople.com
MORGAN & MORGAN, P.A.
201 N Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

Facsimile: (813) 222-4736

Attorneys for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28